

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

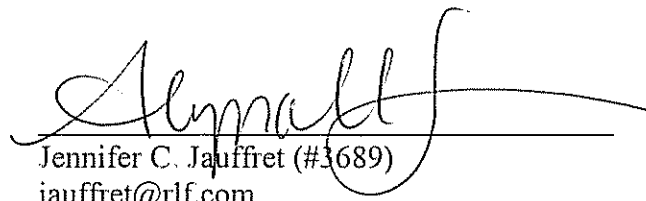
Ashley T. Adams,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Integrity Staffing, aka	)	
Pepper Hamilton, LLP,	)	
Dawn Harper, et al.,	)	Civil Action No. 05-249-KAJ
	)	
Randstad Staffing Services,	)	
Woman of India nationality, et al.,	)	
	)	
JP Morgan Chase Bank One,	)	
Cheryl Denny, et al.,	)	
	)	
Ernest & Young,	)	
Scott Gallagher, et al.,	)	
	)	
Defendants.	)	

**MOTION OF DEFENDANT ERNST & YOUNG, LLP  
TO DISMISS PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendant Ernst & Young, LLP (Ernst & Young"),<sup>1</sup> by its undersigned counsel, moves to dismiss the complaint of plaintiff Ashley T. Adams ("Plaintiff") with prejudice. In support of Ernst & Young's Motion, submitted herewith is Ernst & Young's Opening Brief in Support of its Motion to Dismiss Plaintiff's Complaint. For all of the reasons set forth in the accompanying Opening Brief, Ernst & Young respectfully requests that this Court dismiss the complaint, with prejudice and in its entirety as to Ernst & Young, by entering the attached Order.

---

<sup>1</sup> Incorrectly identified in the complaint as "Ernest & Young."

A handwritten signature in black ink, appearing to read 'Alyssa', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jennifer C. Jauffret (#3689)

jauffret@rlf.com

Alyssa M. Schwartz (#4351)

schwartz@rlf.com

Richards, Layton & Finger, P.A.

One Rodney Square

Wilmington, DE 19801

(302) 651-7700

Counsel for defendant Ernst & Young, LLP

Dated: June 30, 2005

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Ashley T. Adams,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Integrity Staffing, aka	)	
Pepper Hamilton, LLP,	)	
Dawn Harper, et al.,	)	Civil Action No. 05-249-KAJ
	)	
Randstad Staffing Services,	)	
Woman of India nationality, et al.,	)	
	)	
JP Morgan Chase Bank One,	)	
Cheryl Denmeny, et al.,	)	
	)	
Ernest & Young,	)	
Scott Gallagher, et al.,	)	
	)	
Defendants.	)	

**[PROPOSED] ORDER**

The Court, having considered defendant Ernst & Young, LLP's Motion to Dismiss ("Motion"), and all briefing and argument thereon, and good cause having been shown for the relief sought in the Motion,

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2005 that the Motion is GRANTED and that the above-captioned action is dismissed with prejudice as to Ernst & Young, LLP.

\_\_\_\_\_  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2005, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

**VIA HAND DELIVERY**

Sean Patrick McDevitt  
Pepper Hamilton LLP  
1313 Market Street  
Suite 5100  
P. O. Box 1709  
Wilmington, DE 19899-1709

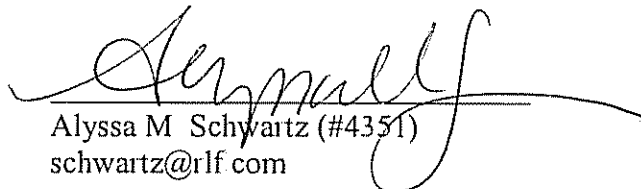
John H. Newcomer, Jr.  
Duane Morris LLP  
1100 North Market Street  
Suite 1200  
Wilmington, DE 19801

Neal J. Levitsky  
Fox Rothschild LLP  
919 North Market Street  
Suite 1300  
P. O. Box 2323  
Wilmington, DE 19899-2323

Sheldon Kevin Rennie  
Fox Rothschild LLP  
919 North Market Street  
Suite 1300  
P. O. Box 2323  
Wilmington, DE 19899-2323

I hereby certify that on June 30, 2005, I have sent by Hand Delivery and First Class U.S. Mail the document(s) to the following plaintiff non-registered participant:

Ashley T. Adams  
716 N. Barrett Lane  
Christiana, DE 19702

  
Alyssa M. Schwartz (#4351)  
schwartz@rlf.com